ORIGINAL

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS NOV 23 PM 2: 13

JENNIFER SANFORD,	DEPUTY CLERK MS	
Plaintiff,) CIVIL ACTION	
v.) Case No.	
NATIONWIDE CREDIT & COLLECTION, INC,	3-21CV2942-	Total Park
Defendant.)	

INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff Jennifer Sanford ("Plaintiff"), an individual consumer, against Defendant Nationwide Credit & Collection, Inc. ("Defendant") for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq. (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

JURISDICTION

- 2. This is a civil action to enforce liability created under the FDCPA.
- 3. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d).
- 4. Jurisdiction of this court arises under 28 U.S.C. § 1337(a).

VENUE

5. Venue in this court is proper under "28 U.S.C. § 1391(b)(1).

6. A substantial part of the events or omissions giving rise to Plaintiff's claim herein occurred in this judicial district.

PARTIES

- 7. Plaintiff, Jennifer Sanford ("Plaintiff"), is a resident of the State of Texas, from whom Defendant attempted to collect a delinquent consumer debt allegedly owed for a defaulted Northwestern Medicine consumer medical account.
 - 8. Plaintiff resides in Dallas County, Texas.
 - 9. Plaintiff is a "consumer" as defined under 15 U.S.C. § 1692a(3).
 - 10. Plaintiff is a natural person.
- 11. Defendant, Nationwide Credit and Collection, Inc. ("NCC"), is an Illinois corporation. It does or transacts business in Illinois. The registered agent is Gregg I Minkow at 330 Oak Knoll Terrace, Northbrook, IL, 60062. (Exhibit A, Record from the Illinois Security of State).
- 12. Defendant is engaged in the business of collecting debt in the state of Illinois with his principal place of business located at 815 Commerce Drive, Suite 270, Oak Brook, Illinois, 60523.
- 13. Defendant is engaged in the collection of debts using one or more instrumentalities of interstate commerce or the mails, and telephone to collect debts originally owed to others.

- 14. NCC holds a collection agency license from the state of Illinois. (Exhibit B Record from Illinois Department of Financial & Professional Regulation).
- 15. Defendant is a "debt collector" as defined under 15 U.S.C. § 1692a(6).

FACTUAL ALLEGATIONS

- 16. On September 23, 2021, Defendant sent Plaintiff a dunning letter attempting to collect \$40.00.
- 17. On October 1, 2021, Defendant sent Plaintiff a second dunning letter attempting to collect \$200.00.
- 18. Defendant sent the dunning letter to Plaintiff via United States Postal Service regular mail on or about September 23, 2021.
- 19. Defendant sent the second dunning letter to Plaintiff via United States Postal Service regular mail on or about October 1, 2021.
- 20. On October 1, 2021, Plaintiff received the dunning letter from Defendant via United States Postal Service regular mail at Plaintiff's residence in Irving, Texas.
- 21. On October 17, 2021, Plaintiff received the second dunning letter from Defendant via United States Postal Service regular mail at Plaintiff's residence in Irving, Texas.

- 22. The dunning letters and alleged debts claimed are attached hereto and incorporated herein as Exhibit C and Exhibit D.
- 23. Defendant made multiple calls to the Plaintiff on September 7, 2021 at 2:36pm and 6:02pm, on September 30, 2021 at noon.
- 24. The subject alleged debt that Defendant was and is attempting to collection from Plaintiff was allegedly incurred for personal, family, or household purposes.
 - 25. Plaintiff is not indebted to Defendant for \$240.00.
 - 26. Plaintiff has not promised to pay Defendant \$240.00.
- 27. Plaintiff has not consented to or entered into any contract with Defendant promising to pay it \$240.00.

CLAIM FOR RELIEF

- 28. Plaintiff realleges and incorporates the foregoing paragraphs verbatim.
- 29. Defendant violated the FDCPA as to its conduct toward Plaintiff.
- 30. Defendant's FDCPA violations include, but are not limited to:
 - a. A representative of the NCC stated that the Plaintiff, a consumer, owed a debt, on a recorded call, on October 4, 2021 at approximately 5:14 P.M. CST in violation of 15 USC § 1692b(2);

- Engaging in collection activity to harass, oppress, or abuse Plaintiff in connection with the collection of an alleged debt of approximately \$240.00 in violation of 15 U.S.C. § 1692d;
- c. Falsely representing the character, amount, or legal status of an alleged debt of approximately \$240.00 in violation of 15 U.S.C. § 1692e(2)(A);
- d. Using false representation or deceptive means via its collection activity and dunning letter(s) to collect or attempt to collect an alleged debt of \$240.00 from Plaintiff in violation of 15 U.S.C. § 1692e(10);
- e. Failing to disclose in communications from Defendant to Plaintiff that the communication is from a debt collector in violation of 15 U.S.C. § 1692e(11);
- f. Attempting to collect \$240.00 from Plaintiff when such amount is not expressly authorized by law or any agreement creating the amount;
- 31. As a result of the foregoing violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages, and costs and attorney's fees.

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendant for the following:

a. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1);

- b. Statutory damages pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c. Costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1692k(a)(3); and
- d. For such other and further relief as the Court may deem just and proper.

Respectfully submitted,

Dated:

November 22, 2021

/s/ Jennifer Sanford
Jennifer Sanford
6535 Deseo Apt 3091
Irving, Texas 75039

Telephone: 219-916-9311 Facsimile: 312-722-6501

Email: snfrd.jnnfr@gmail.com

PLAINTIFF (pro se)

DEMAND FOR JURY TRIAL

Please take notice that Plaintiff demands trial by jury in this action if so triable.

Respectfully submitted,

Dated:

November 22, 2021

/s/ Jennifer Sanford
Jennifer Sanford

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served upon Defendant via his attorney of record via U.S.P.S. priority mail express with sufficient postage attached thereto addressed to:

Vicent Gallelli 815 Commerce Dr. Suite 270 Oak Brook, IL 60523-8852

Gregg I Minkow 330 Oak Knoll Terrace Northbrook, IL, 60062

Respectfully submitted,

Dated:

November 22, 2021

/s/ Jennifer Sanford Jennifer Sanford

Exhibit A



Corporation/LLC Search/Certificate of Good Standing

Corporation File Detail Report

File Number

60042381

Entity Name

NATIONWIDE CREDIT AND COLLECTION INC.

Status ACTIVE

Entity Information

Entity Type
CORPORATION

Type of Corp DOMESTIC BCA

Incorporation Date (Domestic) Wednesday, 15 July 1998

State ILLINOIS

Duration Date PERPETUAL

Agent Information

Name

Address 330 OAK KNOLL TER NORTHBROOK , IL 60062

Change Date Friday, 19 November 2021

Annual Report

Filing Date Tuesday, 18 May 2021

For Year 2021

Officers

President
Name & Address
VINCENT GALLELLI 815 COMMERCEDRIVE SE270 OAK BROOK IL 60523

Secretary
Name & Address
JOHN FALVEY 815 COMMERCE DRIVESE270 OAK BROOK IL 60523

Assumed Name

ACTIVE NCCI, INC.

Return to Search

File Annual Report

Adopting Assumed Name

Articles of Amendment Effecting A Name Change

Change of Registered Agent and/or Registered Office

Exhibit B



Illinois Department of Financial and Professional Regulation

Lookup Detail View

Contact

Contact Information

Name	City/State/Zip	DBA / AKA
NATIONWIDE CREDIT AND COLLECTION INC	Oak Brook, IL 60523	•

License

License Information

License Number	Description	Status	First Effective Date	Effective Date	Expiration Date	Ever Disciplined
017000873 (tel:017000873)	LICENSED COLLECTION AGENCY	ACTIVE	08/29/1987	05/10/2021	05/31/2024	N

Generated on: 11/20/2021 9:35:47 AM

Exhibit C

Fax: (800) 485-0207

Pay Online: https://www.clientaccessweb.com/NCC/payments



Performance - Integrity - Service

September 23, 2021
JENNIFER SANFORD
6535 DESEO APT 3091
IRVING TX 75039-3185



NOTICE OF COLLECTION

This is to notify you that Northwestern Medicine has placed the above Amount Due with our office, Nationwide Credit and Collection, Inc. for the purpose of collecting a debt.

Payment options include: Visa, MasterCard, Discover, Check By Phone, or a payment can be mailed using the payment stub on the bottom of this notice. Please include your File Number on all checks and correspondence. You may also pay your account online by visiting https://www.clientaccessweb.com/NCC/payments and entering File Number: 9854723. If you would like to pay by text, please text the word PAYMENT to 74877.

If you would like to discuss this matter with your account representative, we are available to assist you. When calling regarding your account, please refer to File Number: 9854723.

Thank You, Nationwide Credit & Collection, Inc.

NOTICE PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT (FDCPA) 15 USCA 1692

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose. Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

-Financial Assistance – the creditor is committed to providing information to patients who may need financial help to pay their medical bills. For more information or to obtain a free copy of the creditor's Financial Assistance Program policy or application, please call the creditor or visit the creditor's website.

SEE REVERSE SIDE FOR STATEMENT INFORMATION
Please note: For multiple accounts, payments are applied to the oldest accounts first when not specified.
**** COMPLETE AND RETURN THIS FORM WITH YOUR PAYMENT ***

Y279F87A08

PO Box 505 Linden MI 48451-0505 RETURN SERVICE REQUESTED

September 23, 2021 Phone: (630) 528-5305

IF YOU WISH TO PAY BY CREDIT C	ARD, CIRCLE ONE A	ND FILL IN THE IN	FORMATION BELOW.
	VISA	DISCOVER	
CARD NUMBER			EXP. DATE
CARD HOLDER NAME			cvv
SIGNATURE		AMOUNT PAR	

IF THIS PAYMENT IS FROM AN FSA ACCOUNT PLEASE CHECK HERE:

Creditor: Northwestern Medicine Guarantor: JENNIFER SANFORD File Number: 9854723 Amount Due: \$40.00

Make Payable and Remit payment stub to:

1000 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	TOTAL STREET	March 1997	III III III III III III III III III II
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JENNIFER SANFORD 6535 DESEO APT 3091 IRVING TX 75039-3185



Nationwide Credit & Collection, Inc. c/o Evergreen Bank Group PO Box 3219 Oak Brook IL 60522-3219



00020278-000759-01-1-AA

759-40000-9/8/21

Exhibit D

Page 17 of 18 PageID 21 815 Commerce Dr, Suite 270

Oak Brook, IL 60523-8852

Phone: (630) 528-5305 Fax: (800) 485-0207

Pay Online: https://www.clientaccessweb.com/NCC/payments

October 1, 2021 JENNIFER SANFORD 6535 DESEO APT 3091 IRVING TX 75039-3185

Creditor: Northwestern Medicine File Number: 10082462 Amount Due: \$200.00

NOTICE OF COLLECTION

This is to notify you that Northwestern Medicine has placed the above Amount Due with our office, Nationwide Credit and Collection, Inc. for the purpose of collecting a debt.

Payment options include: Visa, MasterCard, Discover, Check By Phone, or a payment can be mailed using the payment stub on the bottom of this notice. Please include your File Number on all checks and correspondence. You may also pay your account online by visiting https://www.clientaccessweb.com/NCC/payments and entering File Number: 10082462. If you would like to pay by text, please text the word PAYMENT to 74877.

If you would like to discuss this matter with your account representative, we are available to assist you. When calling regarding your account, please refer to File Number: 10082462.

Thank You, Nationwide Credit & Collection, Inc.

NOTICE PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT (FDCPA) 15 USCA 1692

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose. Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

-Financial Assistance – the creditor is committed to providing information to patients who may need financial help to pay their medical bills. For more information or to obtain a free copy of the creditor's Financial Assistance Program policy or application, please call the creditor or visit the creditor's website.

SEE REVERSE SIDE FOR STATEMENT INFORMATION
Please note: For multiple accounts, payments are applied to the oldest accounts first when not specified.
**** GOMPLETE AND RETURN THIS FORM WITH YOUR PAYMENT ***

Y27A671F62

PO Box 505 Linden MI 48451-0505 RETURN SERVICE REQUESTED

October 1, 2021 Phone: (630) 528-5305

IF YOU WISH TO PAY BY CREDIT	CARD, CIRCLE ONE A	AND FILL IN THE IN	FORMATION BELOW.
	VISA	DISC VER	Biological Control of the Control of
CARD NUMBER		The same of the sa	EXP. DATE
CARD HOLDER NAME	Photographic and the state of t		cvv
SIGNATURE		AMOUNT PAI	,———
CONTROL OF THE SECURITIES AND THE PROPERTY OF			

IF THIS PAYMENT IS FROM AN FSA ACCOUNT PLEASE CHECK HERE:

Creditor: Northwestern Medicine Guarantor: JENNIFER SANFORD File Number: 10082462 Amount Due: \$200.00

Make Payable and Remit payment stub to:

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JENNIFER SANFORD 6535 DESEO APT 3091 IRVING TX 75039-3185



Nationwide Credit & Collection, Inc.
c/o Evergreen Bank Group
PO Box 3219
Oak Brook IL 60522-3219



00020278-000133-01-1-AA

133-40000-9/8/21

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(c) Attorneys (Firm Name,	Address, and Telephone Numbe	r)		Attorneys (If K		OF LAND INVOLVED.	
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VI. CAUSE OF ACTION VII. REQUESTED IN	Cite the U.S. Civil Sta 15 U.S.C. § 1692 Brief description of ca Violations of the CHECK IF THIS	Appellate Court tute under which you ar et seq. (Fair Debt C use: FDCPA IS A CLASS ACTION	Reop	pened A (s Do not cite jurisdiction	nother specify) nal statu	Transfer tes unless diversity): CHECK YES only	Litigation - Direct File
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